

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT FOR TENNESSEE**

TIMOTHY ALLEN ATCHISON)	
)	
Plaintiff,)	Civil Action Number 3:24-cv-922
)	
v.)	Jury Demand
)	
)	Judge Trauger
HUBBELL INDUSTRIAL CONTROLS, INC.,)	
)	
)	
Defendant.)	

PLAINTIFF’S MOTION TO WAIVE TELEPHONE DISCOVERY CONFERENCE

1. Plaintiff respectfully requests waiver of any telephone discussion of the pending discovery dispute. Alternatively, Plaintiff requests that the necessary and urgent “Motion to Compel” be treated as a “Motion for a Preliminary Telephone Conference.” The above-referenced matter is scheduled for a multi-day jury trial commencing April 14, 2026. The case is technically and factually complex. Because of the matters outlined in the proposed, filed “Motion to Compel,” almost nothing has been accomplished with regard to meaningful discovery. As the discussions have produced no progress, time is a substantial, prejudicial factor for the Plaintiff. Following Plaintiff’s submission of a good faith letter describing the discovery issues, and the parties’ participation in a lengthy telephone conversation, a “Joint Discovery Dispute Statement” has been filed.

2. The substantial differences have been exhaustively discussed. Plaintiff moves the Court for an Order permitting a “Motion to Compel” to proceed, and respectfully requests an in-court presentation of the several issues that have entirely impeded any meaningful discovery in

the case. The proposed, submitted Motion to Compel confirms that little will be accomplished by further telephone discussions in a matter in which both parties are going to be challenged to complete the discovery needed to prepare the matter for an April trial date.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing was served via email on the 1st day of August, 2025.

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